
EXHIBIT 25

COMMONWEALTH OF PENNSYLVANIA



COMPLAINT

WARRANT/SUMMONS

NO. _____

vs. Jeffrey Shaak 25 w/m

376 N. Main st. Sellersville Pa.

(Name)

(Address)

Det. Thomas Wholey # 942

Residing at Northeast Det. Division

do hereby state under oath or affirmation, that

COMPLETE THE FOLLOWING AS APPLICABLE

I accuse Jeffrey Shaak (Name) 376 N. Main st. Sellersville Pa. (Address)

with violating the penal Laws of The Commonwealth of Pennsylvania

or

I accuse an individual whose name is unknown to me but who is described as _____

and who bears the nickname or popular designation of _____
with violating the penal laws of the Commonwealth of Pennsylvania

CO-DEPT JOHN BARSUM 77-3-2974

I accuse an individual whose name, nickname or popular designation is unknown to me, but who is described as
BRUCE DEREWAL 77-3-2976
with violating the penal laws of the Commonwealth of Pennsylvania and therefore I have designated him as John Doe.

On or about Tuesday 3-29-77 (Day) (Date) DE REWAL 73-2973, in the county of Philadelphia, the accused committed

the following acts: Did in company with others conspired to pollute the waters of the Commonwealth of Pa. being the Delaware river at Robbins ave. & the Delaware river. Polluting material being a liquid consistency containing sulphuric acid. Charged: Crim. attempts sec. 901 M3 viol. Pa. clean streams act. Purdons statute 35 sec. 691-307 & crim. consp. 903 M3 all of which were against the

peace and dignity of the Commonwealth of Pennsylvania and contrary to the pertinent Acts of Assembly. I ask that a warrant of arrest or a summons be issued and that the accused be required to answer the charges I have made; and I swear to or affirm the within complaint upon my knowledge, information and belief.

3-29-77

Date

Complainant

I hereby certify the above as true and correct to the best of my information and belief, and sign on _____, 19____ before _____ whose office is that of Judge

Affiant

WAIVER

On _____, 19____, I appeared before _____

_____, Judge,
who read the within complaint to me and explained its contents, and I hereby waive preliminary hearing and consent to be found over to court.

Defendant

Attorney for Defendant

Address of Attorney

COMMONWEALTH OF PENNSYLVANIA ss.
COUNTY OF PHILADELPHIAPersonally appeared before me on 3.29.77
19____, the affiant above named who, being duly sworn (affirmed), according to law, signed the complaint in my presence and deposed and said that the facts set forth therein are true and correct to the best of his (her) knowledge, information, and belief.

I believe the within affiant to be a responsible person and that there is probable cause for the issuance of process.

PHKS003230

Judge, Municipal Court

(D23)

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EXHIBIT 26

Aut

Waste April 1977 Business
Bldg # 6

DATE	Waste	Company	Gallons	Trucker
3/28/77	Spent Acid	CDN AETC	2800	
3/28/77	Spent Acid	CDN AETC	3000	
3/29/77	Spent Acid	CDN AETC	2800	
4/4/77	Spent Acid	CDN P. VanHeuven	3500	Modern Transportation
4/4/77	Spent Acid	CDN P. VanHeuven	3500	Modern Transportation
4/5/77	Spent Acid	CDN AETC	2800	
4/5/77	Waste Water	CDN AETC	4000	
4/5/77	Spent Acid	CDN P. VanHeuven	3500	Modern Transportation
4/6/77	Spent Acid	CDN P. VanHeuven	3500	Modern Transportation
4/12/77	Spent Acid	CDN P. VanHeuven	3500	Modern Transportation
4/12/77	Spent Acid	CDN AETC	3500	Modern Transportation
4/12/77	Waste Water	CDN AETC	5500	Modern Transportation
4/13/77	Spent Acid	CDN P. VanHeuven	3500	Modern Transportation
4/15/77	Spent Acid	CDN AETC	3500	Modern Transportation

Waste April 1977 Business
PLANT Area

3/31/77	Waste Water Dyes	AETC	5500	
4/2/77	Waste Water Dyes	AETC	4000	
4/6/77	Waste Water Dyes	AETC	4000	
4/7/77	Waste Water Dyes	AETC	5500	Modern Transportation
4/14/77	Waste Water Dyes	AETC	5500	Modern Transportation
4/20/77	Waste Water Dyes	AETC	5400	Modern Transportation
4/21/77	Waste Water Dyes	AETC	5400	Modern Transportation

1730
1830
5500

Waste Business May 1977

Plant areas

DATE	Waste	Company	Gallons		Destination	ORIGINAL Required	
4/26	Waste Water Dyes	AETC	5400	-	Modern	None	1
4/28	Waste Water Dyes	AETC	5400	-	Modern	None	2
4/30	Waste Water Dyes	AETC	5400	-	Modern	None	3
5/3	Waste Water Dyes	County Septic	5500	-	Rollins	Comb Liquid	4
5/6	Waste Water Dyes	County Septic	5500	-	Rollins	FL. Liquid	5
5/10	Waste Water Dyes	County Septic	5500	-	Rollins	FL. Liquid	6
5/12	Waste Solvents	AETC	5500	-	ALL County	FL. Liquid	7
5/12	Waste (Roll off)	AETC	(Roll off)	-	Jersey Sanitation	None	8
5/18	Waste Water Dyes	County Septic	5500	-	Rollins	Comb Lip	9
5/20	Residues Solid Chem Waste		79 drs	-	Sanitary Land Fill	20 drs Curative 59 drs None	10
5/14	Waste Water Dyes	County Septic	5500	-	Modern	None	11
5/20	Waste (Roll off)	AETC	(Roll off)	-	Jersey Sanitation	None	12
5/24	Waste Water Dyes	County Septic	5500	-	Rollins	FL. Lip	13
5/24	Waste Solvents	AETC	2500	-	ALL County	FL. Lip	14
5/24	Waste (Roll off)	AETC	(Roll off)	-	Jersey Sanitation	None	15
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Waste June 1977 Business
Plant

BSA1034169

DATE	Waste	Company	Gallons	Destination	Hazar
1 5/26/77	Waste Solvents	AETC	5500	ALL County	Flamm
2 5/27/77	Waste Water (Dyes)	County Septic	5500	Modern	None
3 5/27/77	Waste Water Dyes	County Septic	5500	Modern	None
4 6/1/77	Residues	Chemical Waste	79 drs	Sanitary Land Fill	16 drs Co 63 drs
5 6/1/77	Waste Solvents	AETC	5500	ALL County	Flamm
6 6/2/77	Waste Water Dyes	County Septic	5500	Modern	None
7 6/3/77	Waste Solvents	AETC	5500	ALL County	Flamm
8 6/4/77	Waste Solvents	AETC	5500	ALL County	Flamm
9 6/6/77	Waste Water Dyes	AETC (REFR)	5500	Modern	None
10 6/6/77	Waste (Roll off)	AETC	Roll off	Jersey Sanitation	None
11 6/8/77	Waste Water Dyes	County Septic	5500	Modern	None
12 6/9/77	Waste Water Dyes	County Septic	5500	Modern	None
13 6/10/77	Waste Solvents	AETC	5500	ALL County	Flamm
14 6/13/77	Waste Water Dyes	County Septic	5500	Modern	None
15 6/13/77	Waste Solvents	AETC	5500	ALL County	Flamm
16 6/15/77	Waste Water Dyes	County Septic	5500	Modern	None
17 6/16/77	Waste Solvents	AETC	5500	ALL County	Flamm
18 6/16/77	Waste Residues	Chemical Waste	79 drs	Sanitary Land Fill	None
19 6/17/77	Waste Water Dyes	County Septic	5500	Rollins	Combust?
20 6/22/77	Waste Solvents	AETC	5500	ALL County	Flamm
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BSA1034170

Bldg = 6

Newco 15
+ Freight 6.60

DATE	Waste	Company	Gallons	Used	Destination	Hazard
5/26/77	Spent Acid	Scientific	3150	2047.50	Alchemtron	Corrosive
5/27/77	Spent Acid	RJ Proper	2925	13.12	RJ Proper (B. Zumbo)	Corrosive
5/28/77	Spent Acid	Chemical Waste	2760	13.80	Sanitary Landfill	Corrosive
5/31/77	Spent Acid	County Septic	3100	1705	American Recovery	Corrosive
6/1/77	Spent Acid	Scientific	3150	2047.50	Alchemtron	Corrosive
6/2/77	Spent Acid	County Septic	3100	1705	American Recovery	Corrosive
6/2/77	Waste Water (CDN)	County Septic	5500		Modern	None
6/3/77	Spent Acid	Chemical Waste	2760	13.80	Sanitary Landfill	Corrosive
6/4/77	Spent Acid	Chemical Waste	2760	13.80	Sanitary Landfill	Corrosive
6/6/77	Spent Acid	County Septic	3100	1705	American Recovery	Corrosive
6/7/77	Spent Acid	County Septic	3100		American Recovery	Corrosive
6/7/77	Spent Acid	Chemical Waste	2760	13.80	Sanitary Landfill	Corrosive
6/7/77	Waste Water (CDN)	County Septic	5500		Modern	None
6/8/77	Spent Acid	Scientific	3150	2047.50	Alchemtron	Corrosive
6/9/77	Spent Acid	Newco	2781	2677.44	Newco	Corrosive
6/10/77	Spent Acid	Chemical Waste	2760	13.80	Sanitary Landfill	Corrosive
6/11/77	Spent Acid	Chemical Waste	2760	13.80	Sanitary Landfill	Corrosive
6/14/77	Waste Water (CDN)	AETC (R&R)	5500		Modern	None
6/14/77	Spent Acid	Scientific	3150	2047.50	Alchemtron	Corrosive
6/14/77	Spent Acid	County Septic	3100	1705	American Recovery	Corrosive
6/15/77	Spent Acid	Newco	2781		Newco	Corrosive
6/16/77	Waste Water (CDN)	AETC (R&R)	5500		Modern	None
6/16/77	Spent Acid	RJ Proper	3334	1667	RJ Proper (B. Zumbo)	Corrosive
6/16/77	Spent Acid	Chemical Waste	2760		Sanitary Landfill	Corrosive
6/17/77	Spent Acid	County Septic	3100		American Recovery	Corrosive
6/17/77	Spent Acid	Newco	2781	2599.31	Newco	Corrosive
6/17/77	Spent Acid	Chemical Waste	2760		Sanitary Landfill	Corrosive
6/20/77	Spent Acid	Newco	2781		Newco	Corrosive
6/21/77	Spent Acid	Scientific	3150		Alchemtron	Corrosive
6/22/77	Spent Acid	ORA (Matlab)	3000	44,040	ORA	Corrosive
6/22/77	Waste Water (CDN)	County Septic	5500		Modern	None
6/22/77	Spent Acid	County Septic	3100		American Recovery	Corrosive
6/24/77	Spent Acid	Scientific	3150		Alchemtron	Corrosive
6/25/77	Spent Acid	County Septic	3100		American Recovery	Corrosive

1500

37 45,228.25 86,863 gals

38 County 3200.00
39 Rental 1500.00

Waste July 1977 Business
Plant

(Rev)

DATE	Waste	Company	Gallons	Destination	Hazard	Cost
6/30	Waste Solvents	AETC	5500 gals	ALL County	Flammable	880.00
6/30	Residue (Solid)	Chemical Waste	7 drums	Sanitary Landfill	None	1750.00
7/6	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/11	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/13	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/13	Waste Solvents	AETC	5500 gals	ALL County	Flammable	880.00
7/22	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/22	Waste Water	AETC (R.R.)	5500 gals	Modern	None	727.50
7/22	Sludge (Waste Water)	AETC	3000 gals	R.R. Sanitation	None	690.00
7/25	Waste Solvents	AETC	5500 gals	ALL County	Flammable	880.00
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Waste July 1975
Bldg # 6. (CDN)

Business

Page 9 of 16

DATE	Waste	Company	Gallons or Pounds	Destination	Hazard	Cost
6/27	Spent Acid	Matlak	44,240	ORA Corp **	Corrosive	1437.80
6/28	Waste Water	County Septic	5500 gals	Modern	None	920.00
6/28	Spent Acid	Newco	2550 gals	Newco	Corrosive	2457.61
6/29	Spent Acid	Scientific	3150 gals	AlchemTron	Corrosive	2047.50
6/29	Spent Acid	Matlak	43,680	ORA Corp **	Corrosive	1419.60
6/30	Waste Water	AETC (R/R)	5500 gals	Modern	None	727.50
6/30	Spent Acid	Newco	2700 gals	Newco	Corrosive	2525.71
6/30	Spent Acid	R.T. Proper	3000 gals	R.T. Proper (B. Zimmer)	Corrosive	1557.50
7/1	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2105.00
7/2	Spent Acid	Newco	2400 gals	Newco	Corrosive	2164.53
7/5	Spent Acid	Matlak	43,180	ORA Corp **	Corrosive	1413.25
7/6	Spent Acid	Newco	2575 gals	Newco	Corrosive	2470.03
7/8	Spent Acid	Newco	2450 gals	Newco	Corrosive	2362.15
7/8	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2105.00
7/8	Spent Acid	Scientific	3150 gals	AlchemTron	Corrosive	2047.50
7/11	Waste Water	County Septic	5500 gals	Modern	None	920.00
7/11	Spent Acid	Matlak	44,240	ORA Corp **	Corrosive	1447.80
7/12	Spent Acid	Matlak	43,480	ORA Corp **	Corrosive	1413.10
7/13	Waste Water	AETC (R/R)	5500 gals	Modern	None	727.50
7/13	Spent Acid	Scientific	3150 gals	AlchemTron	Corrosive	2047.50
7/13	Spent Acid	Matlak	40,000	ORA Corp **	Corrosive	1310.00
7/14	Spent Acid	Matlak	45,100	ORA Corp **	Corrosive	1475.75
7/15	Spent Acid	Newco	2575 gals	Newco	Corrosive	2470.03
7/18	Spent Acid	County Septic	3000 gals	American Recovery	Corrosive	1950.00
7/19	Spent Acid	Matlak	44,100	ORA Corp **	Corrosive	1453.25
7/20	Spent Acid	Matlak	46,620	ORA Corp **	Corrosive	1525.15
7/22	Spent Acid	Matlak	43,000	ORA Corp **	Corrosive	1407.50
7/23	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2105.00
7/25	Waste Water	County Septic	5500 gals	Modern	None	920.00
7/25	Spent Acid	Matlak	41060	ORA Corp **	Corrosive	1344.45

* Includes \$400 Transportation (County Septic) \$0.55 per gallon To American Recovery
 ** Does NOT Include \$0.0125 per ~~gallon~~ ^{pound} To ORA Corp

*** Estimated Cost.

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Waste August 1977 Business
Bldg #6 (CDN)

DATE	Waste	Company	Gallons or Pounds	DESTINATION	Hazard	Cost
7/26/77	Spent Acid	Matlak	40,200 lbs	ORA Corp	Corrosive	1324.5
7/27/77	Waste Water	AETC(RR)	5500 gals	Modern	None	727.5
7/27/77	Spent Acid	Matlak	42,280 lbs	ORA Corp	Corrosive	1508.9
7/29/77	Spent Acid	Matlak	51,510 lbs	ORA Corp	Corrosive	1684.1
8/3/77	Spent Acid	Matlak	43,460 lbs	ORA Corp	Corrosive	1431.1
8/4/77	Spent Acid	Matlak	44,040 lbs	ORA Corp	Corrosive	1450.1
8/5/77	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2105.5
8/5/77	Waste Water	AETC(RR)	5500 gals	Modern	None	727.5
8/8/77	Spent Acid	Matlak	39,760 lbs	ORA Corp	Corrosive	1318.5
8/9/77	Waste Water	AETC(RR)	5500 gals	Modern	None	727.5
8/9/77	Spent Acid	Matlak	40,920 lbs	ORA Corp	Corrosive	1350.0
8/9/77	Spent Acid	Matlak	40,100 lbs	ORA Corp	Corrosive	1321.2
8/11/77	Spent Acid	Scientific	3150 gals	AL Chemtron	Corrosive	2047.5
8/11/77	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2105.5
8/11/77	Spent Acid	Matlak	39,960 lbs	ORA Corp	Corrosive	1318.5
8/12/77	Spent Acid	Newco	38,480 lbs	Newco	Corrosive	2450.1
8/12/77	Spent Acid	Matlak	36,640 lbs	ORA Corp	Corrosive	1318.5
8/17/77	Waste Water	AETC(RR)	5500 gals	Modern	None	727.5
8/19/77	Waste Water	AETC(RR)	5500 gals	Modern	None	727.5
8/19/77	Spent Acid	Matlak	43,100 lbs	ORA Corp	Corrosive	1419.1
8/19/77	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2105.5
Cost For Spent Acid Disposal						
ORA Corp (matlak)			34563 gals			
			33,111 gals			
				\$15343.77	Transportation	
				\$5768.75	To ORA	
				\$21,112.52	Total or 0.69/gal	
American Recovery			9300 gals			
				\$6315	Transp. & Payment To	
				\$1550	Truck Rental/Driver	
				\$7865	Total or 0.85/gal	
Scientific			3150 gals			
				\$2047	Total or 0.65/gal	
Newco			2550 gals			
				\$2450.47	or 0.96/gal	
Grand Total			45,563 gals			
				\$33,474.99	= \$0.735/gal	
J. K. Jones						

BSAI033961

art

Waste July 1977 Business
Plant

GAL

DATE	Waste	Company	Gallons	Destination	Hazard	Cost
6/30	Waste Solvents	AETC	5500 gals	ALL County	Flammable	880.00
6/30	Residue (Solid)	Chemical Waste	75 drums	Sanitary Landfill	None	1750.00
7/6	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/11	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/13	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/13	Waste Solvents	AETC	5500 gals	ALL County	Flammable	880.00
7/22	Waste Water	County Septic	5500 gals	Modern	None	755.00
7/22	Waste Water	AETC (R/R)	5500 gals	Modern	None	727.50
7/22	Sludge (Waste Water)	AETC	3000 gals	R/R Sanitation	None	690.00
7/25	Waste Solvents	AETC	5500 gals	ALL County	Flammable	880.00
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BSAI033935

Waste Sept. 1977 Business
Plant

ORIGINAL

(Red)

DATE	Waste	Company	Gallons	Destination	Hazard	Cost
9/2/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00
9/11/77	Waste Solvents	AETC	5500 gals	All County	Flammable	880.00
9/14/77	Waste Water	County Septic	5500 gals	Modern	None	755.00
9/19/77	Waste Water	County Septic	5500 gals	Modern	None	755.00

No Waste From Bldg. #6 (CDN)

BSAI033934

Waste October 1977 Business
Bldg. #6 (CDN)

DATE	Waste	Company	Gallons or Pounds	Destination	Hazard	Cost
10/18/77	Spent Acid	Scientific	3400 gals	AL Chemtron	Corrosive	2015
10/24/77	Spent Acid	Scientific	3150 gals	AL Chemtron	Corrosive	20475
10/18/77	Spent Acid	County Septic	3100 gals	American Recovery	Corrosive	2605-
10/21/77	Waste Water	AETC	5500 gals	Modern Transport	None	727.50

Waste October 1977 Business
PLANT

DATE	Waste	Company	Gallons or Pounds	Destination	Hazard	Cost
10/3/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00
10/4/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00
10/7/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00
10/14/77	Waste Solvents	AETC	6000 gals	All County	Flammable	960.00
10/17/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00
10/19/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00
10/21/77	Waste Water	County Septic	5500 gals	Modern Trans.	None	755.00

Cost Spent Acid

American Recovery 3100 gals \$55 per gal. To Am. Rec.
\$400 Transportation County Septic
(County Septic) \$500 10 days Trailer Rental @ Am. Rec.
Total Cost per gal. \$0.84

Scientific 6250 gals \$0.65 per gal.
Total Cost \$0.65

Average Cost per Gallon Total \$0.71

Bldg #6 Waste November Business 1976

ORIGINAL
(1100)

DATE	Waste	Company	Gallons
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10/26/76	Spent Acid	AEC	3000
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10/27/76	Waste Water (con)	AEC	4500
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Waste PLANT AREA

November Business 1976

10/29/76	Waste Water Dyes	AEC	4500
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11/4/76	Xylene Flammable liq		39-55 gal drums
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	Toluene "	AEC	30-55 gal drums
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	Methanol "	AEC	4-55 gal drums
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	Naphtha		7-55 gal drums
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1- Truck load
80 drums
TOTAL

11/4/76	Waste Water Dyes	AEC	4500
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11/5/76	Waste Water Dyes	AEC	4500
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11/9/76	Waste Water Dyes	AEC	4500
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11/15/76	Waste Water Dyes	AEC	4500
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11/18/76	Waste Water Dyes	AEC	4500
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11/21/76	Phthalide Acid Water	AEC	3000
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BSAI033932

MADE IN

Waste November 1977
PhonT

	Date	Waste	Company	Gallons	Destination	Hazard	Cost
1	10/27/77	Waste Water	County Septic	5500	Chemical Control		6050
2	11/2	Waste Water	County Septic	5500	Chemical Control		6050
3	11/3	Waste Water	County Septic	5500	Chemical Control		6050
4	11/3	Solvents	AETC	6000	All County		9600
5	11/7	Waste Water	County Septic	4500	Chemical Control		4950
6	11/7	Phthalide Water	AETC	4000	Modern		9300
7	11/10	Waste Water	County Septic	5500	Chemical Control		6050
8	11/10	Phthalide Water	AETC	4000	Modern		9300
9	11/11	Waste Water	AETC	4000	Chemical Control		7275
10	11/16	Waste Water	County Septic	5500	Chemical Control		6050

BSAI033945